

DRAWINGS

The drawings have been amended and new, replacement drawings have been submitted. In particular, Figure 3 was amended by deleting the reference numeral "84" which is a duplicate of reference numeral "6."

REMARKS

The drawings have been amended and new drawings have been submitted. In Figure 3, the reference numeral "84" has been taken out as a duplicate of reference numeral "6." Applicants appreciate the Examiner's very thorough review of the drawings. Approval of the new, replacement drawings by the Examiner, and subsequent removal of the objection to the drawings is respectfully requested.

The specification has been amended in paragraph 1 by inserting the missing application numbers and filing dates. In addition, the application has been amended at paragraph 22 by inserting the definition of a drelt.

Entry of the amendments is respectfully requested.

Review and reconsideration on the merits are further requested.

The specification has been objected to for various reasons. The Examiner's objections, followed by Applicant's responses are set forth below.

1) Regarding the objection to the missing application numbers and filing dates, Applicants have amended the specification at page 1, paragraph 1 by inserting the missing application numbers and filing dates.

2) Regarding the objection to the use of the term "drelt," Applicants respectfully traverse the objection. A "drelt" is a belt that is formed over a drum. The term is well-known to one of ordinary skill in the art, and is regularly used by Applicants and others in photoreceptor applications wherein a drelt is used. Applicants have amended the specification at page 7, paragraph 22, by inserting "(a cross between a drum and a belt, wherein the belt is placed on the drum)" in an attempt to make the term more clear. Applicants respectfully request withdrawal of the objection to the use of the term "drelt" in light of the well-known term, and in light of Applicants' clarifying amendment.

3) Regarding the objection to the term "Mor-Ester," Applicants do their very best to make certain that all trademarks are recognized as such in Applicants' patent applications. In this case, Applicants respectfully submit that "Mor-Ester" is spelled corrected in the patent application. On information and belief, the trademark is owned by Raam and Haas, and the product thereof is marketed by Morton International. Enclosed is a copy of a listing of some of Raam and Haas brands, and shows that the spelling used in the application is correct. Applicants respectfully request withdrawal of

the objection to the specification, as the trademark "Mor-Ester" is spelled correctly in the specification.

In view of the above arguments and amendments, Applicants respectfully request withdrawal of the objections to the specification.

Claims 1-20 have been rejected under 35 U.S.C. §112, second paragraph, as being incomplete. In response, Applicants have amended the independent claims by adding a recitation directed towards an electrically conductive substrate. In view of the amendments, Applicants respectfully request withdrawal of the rejection of claims 1-20 under 35 U.S.C. §112, second paragraph.

Claims 1-20 have been rejected under 35 U.S.C. §112, first paragraph, based on a non-enabling disclosure because the claims do not recite an electrically conductive substrate. In response, Applicants have amended the independent claims by adding a recitation directed towards an electrically conductive substrate. In view of the amendments, Applicants respectfully request withdrawal of the rejection of claims 1-20 under 35 U.S.C. §112, first paragraph.

Claims 1-11, 17 and 18 have been rejected under 35 U.S.C. §103 as obvious over Yu (5,382,486, hereinafter "Yu '486") as evidenced by Applicants admissions in paragraph 78 (hereinafter "Admission 1") and Yu (5,021,309, hereinafter "Yu '309") in view of Service and Viswanathan. In response, Applicants respectfully traverse the rejection.

Applicants are not sure what is meant by "Applicants admissions in paragraph 78" and how the present specification recitations are related to the outstanding rejection in the Office Action. Applicants respectfully request the Examiner to clarify in the next correspondence with Applicants.

Applicants respectfully submit that one of ordinary skill in the art would not have been motivated to combine Viswanathan and Service with Yu '309 and Yu '486. Yu '309 and Yu '486 relate to photoreceptors (imaging member). On the other hand, Service relates to self-supporting sheets or self-supporting polymer films used in semiconductors. Also, Viswanathan relates to ferromagnetic compounds. Service teaches that Ligno-PANI inhibits corrosion on architectural structures such as steel bridges by slowing the growth of rust. Service also teaches that Ligno-PANI can be

used to provide a suitable level of conductivity for self-supporting conductive polymer film for semiconductors. Viswanathan submits that the use of the sulfonated lignin is to "shield electromagnetic radiation" (Abstract). Applicants submit that one of ordinary skill in the art faced with a teaching of using sulfonated lignin as a shield for electromagnetic radiation (Viswanathan), or to protect for corrosion or to be used in semiconductors (Service) would not have been motivated to use this same material as an additive in an anticurl backing layer in a photoreceptor used in the electrostatographic arts as taught by Yu '309 and Yu '486.

Applicants respectfully submit that there is no teaching in any of the references cited, that materials suitable in shielding electromagnetic radiation (Viswanathan) and useful in semiconductors (Service) could be useful in reducing the build-up of static charge or debris on a photoreceptor, or to prevent cracking, and especially, to use the lignin material in the specific anti-curl backing layer as claimed.

The current specification states that one of the reasons for using the claimed material is to reduce the static charge build-up and debris build-up on the photoreceptor (paragraph 12 of the present specification). Another reason for using the material is for preventing premature cracking of the belt material (paragraph 12 of present specification). There is no teaching in any of the references cited, that materials suitable in shielding electromagnetic radiation (Viswanathan), preventing corrosion or leveling conductivity (Service), could be useful in reducing the build-up of static charge or debris on a photoreceptor, or to prevent cracking. Applicants further submit that there would have been no expectation of success that a material similar to one used to shield electromagnetic radiation, prevent corrosion or level conductivity, would work well in reducing the build-up of static charge and debris on a photoreceptor, or to prevent cracking thereof, and there is no specific motivation for using the material in the specific layer claimed.

Applicants further submit that Viswanathan and Service are not in the same field of endeavor as Yu '309 and Yu '486. The Yu references relate to photoreceptors. As stated above, Viswanathan relates to electromagnetic radiation, and Service relates to semiconductors. The references also do not teach or suggest solving the problems solved by the use of the claimed lignin in photoreceptors. In addition, as set forth above,

there would have been no expectation that a material taught for use in shielding electromagnetic radiation (Viswanathan), preventing corrosion or leveling conductivity (Service), could be successful in reducing the build-up of static charge or debris on the photoreceptor, or to prevent cracking thereof. Therefore, because the references are not related, because there is no expectation of success, and because the references do not teach the problem solved by the present claims, Applicants submit that the references are not in the same field of endeavor and that one of ordinary skill would not have been motivated to combine the references cited.

Applicants further submit that there is no motivation to modify the materials taught by the photoreceptor references, to include the claimed lignin material. Yu '486 teaches use of polyaniline in an anti-curl backing layer (col. 16, lines 11-12). Yu '309 teaches an anti-curl backing layer comprising organic polymers and/or organic fillers. There is no teaching or suggestion in any of the references that would have motivated one of ordinary skill in the art to go to a reference teaching use of the claimed lignin material in a semiconductor (Service) or a lignin material used as a ferromagnetic material (Viswanathan), and replace the specific organic fillers taught by Yu '309 with such a completely different material such as the claimed lignin material. Similarly, Applicants submit that there is no teaching or suggestion in any of the references that would have motivated one of ordinary skill in the art to go to a reference teaching use of the claimed lignin material in a semiconductor (Service) or a lignin material used as a ferromagnetic material (Viswanathan), and replace the polyaniline taught by Yu '486 with such a completely different material such as the claimed lignin material.

Therefore, Applicants respectfully submit that the present claims are not obvious in view of the cited combination, and request withdrawal of the rejection of claims 1-11, 17 and 18 under 35 U.S.C. §103 as obvious over Yu (5,382,486, hereinafter "Yu '486") as evidenced by Applicants admissions in paragraph 78 (hereinafter "Admission 1") and Yu (5,021,309, hereinafter "Yu '309) in view of Service and Viswanathan.

Claims 12-14 have been rejected under 35 U.S.C. §103 as obvious over Yu (5,382,486, hereinafter "Yu '486") as evidenced by Applicants admissions in paragraph 78 (hereinafter "Admission 1") and Yu (5,021,309, hereinafter "Yu '309) in view of

Service and Viswanathan, as applied to claim 1, and further in view of Yu '309 again. In response, Applicants respectfully traverse the rejection.

Because claims 12-14 ultimately depend from claim 1, and therefore include the recitations of claim 1 therein, Applicants repeat the above arguments as to why claim 1 (and therefore 12-14) is not obvious in view of the cited combination. Applicants respectfully submit that one of ordinary skill in the art would not have been motivated to use a material taught to be useful as a shield for radiation (Viswanathan) or useful in semiconductors (Service) as an additive in an anticurl backing layer in a photoreceptor used in the electrostatographic arts, the photoreceptors being taught by the Yu references. There is no teaching in any of the references cited, that materials suitable in shielding electromagnetic radiation could be useful in reducing the build up of static charge or debris on the photoreceptor, or to prevent cracking. Applicants further submit that there would have been no expectation of success that a material similar to one used to shield electromagnetic radiation would work well in reducing the build up of static charge and debris on a photoreceptor, or to prevent cracking thereof. Moreover, Applicants submit that one of ordinary skill would not have been motivated to replace the organic fillers of Yu '309 with such different lignin fillers as taught by Viswanathan and Service. Similarly, Applicants submit that one of ordinary skill would not have been motivated to replace the polyaniline of Yu '486 with such different lignin fillers as taught by Viswanathan and Service.

Therefore, Applicants respectfully submit that the present claims are not obvious in view of the cited combination, and request withdrawal of the rejection of claims 12-14 under 35 U.S.C. §103 as obvious over Yu (5,382,486, hereinafter "Yu '486") as evidenced by Applicants admissions in paragraph 78 (hereinafter "Admission 1") and Yu (5,021,309, hereinafter "Yu '309") in view of Service and Viswanathan, as applied to claim 1 and further in view of Yu '309.

Claims 19-20 have been rejected under 35 U.S.C. §103 as obvious over Yu (5,382,486, hereinafter "Yu '486") as evidenced by Applicants admissions in paragraph 78 (hereinafter "Admission 1") and Yu (5,021,309, hereinafter "Yu '309") in view of Service and Viswanathan, as applied to claim 1, and further in view of Ring and Diamond. In response, Applicants respectfully traverse the rejection.

Because claims 19-20 include the recitations of claim 1, Applicants repeat the above arguments as to why claim 1 (and therefore 19-20) is not obvious in view of the cited combination. Applicants respectfully submit that one of ordinary skill in the art would not have been motivated to use a material taught to be useful as a shield for radiation (Viswanathan) and for use in a semiconductor (Service) as an additive in an anti-curl backing layer in a photoreceptor used in the electrostatographic arts. There is no teaching in any of the references cited, that materials suitable in shielding electromagnetic radiation or for use in semiconductors could be useful in reducing the build up of static charge or debris on the photoreceptor, or to prevent cracking. Applicants further submit that there would have been no expectation of success that a material similar to one used to shield electromagnetic radiation or as used in semiconductors, would work well in reducing the build-up of static charge and debris on a photoreceptor, or to prevent cracking thereof. Moreover, Applicants submit that one of ordinary skill would not have been motivated to replace the organic fillers of Yu '309 with such different fillers as taught by Viswanathan and Service. Similarly, Applicants submit that one of ordinary skill would not have been motivated to replace the polyaniline of Yu '486 with such different fillers as taught by Viswanathan and Service. In addition, there is no teaching or suggestion to use the materials in the specifically claimed anti-curl backing layer.

Applicants submit that Ring and Diamond do not provide the deficiencies of the primary, secondary, tertiary or quaternary references, that of providing motivation to use a material similar to the material disclosed in Viswanathan and Service, substituted for the polyaniline in Yu '486 or the organic filler in Yu '809, in an anti-curl backing layer as claimed.

Therefore, Applicants respectfully submit that the present claims are not obvious in view of the cited combination, and request withdrawal of the rejection of claims 19-20 under 35 U.S.C. §103 as obvious over Yu (5,382,486, hereinafter "Yu '486") as evidenced by Applicants admissions in paragraph 78 (hereinafter "Admission 1") and Yu (5,021,309, hereinafter "Yu '309") in view of Service and Viswanathan, as applied to claim 1 and further in view of Ring and Diamond.

Claim 20 is provisionally rejected on the ground of non-statutory obviousness-type double patenting as being obvious over claims 19 and 20 of co-pending application serial number 10/824,794. In response, Applicants respectfully traverse the rejection.

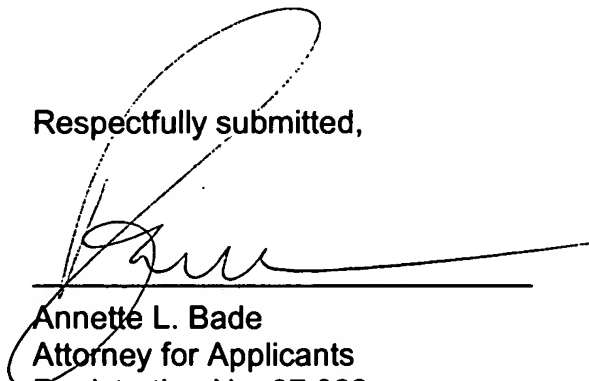
Applicants respectfully submit that it would not have been obvious to use the same or similar material in an anticurl backing layer, and in a grounding strip as claimed in the two applications. However, in order to advance prosecution of the case, Applicants submit herewith a terminal disclaimer. In view of the submission of the terminal disclaimer, Applicants respectfully request withdrawal of the provisional rejection on the ground of non-statutory obviousness-type double patenting as being obvious over claims 19 and 20 of co-pending application serial number 10/824,794.

In view of the above arguments, amendments, and Terminal Disclaimer submission, Applicants submit that all claims are now in condition for allowance. Early indication of allowability is respectfully requested.

No additional fee is believed to be required for this amendment. However, the undersigned Xerox Corporation attorney (or agent) hereby authorizes the charging of any necessary fees, other than the issue fee, to Xerox Corporation Deposit Account No. 24-0025. This also constitutes a request for any needed extension of time and authorization to charge all fees therefor to Xerox Corporation Deposit Account No. 24-0025.

In the event the Examiner considers personal contact advantageous to the disposition of this case, s/he is hereby authorized to call Applicant's Attorney, Annette L. Bade, at telephone number (310) 333-3682.

Respectfully submitted,



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Formal Drawings for

Agent or Attorney: **Annette L. Bade**

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4 Sheets / **5** Figures

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**US Formals
REPLACEMENT SHEET**

Amended Figure 3

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